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Upcoming amendments to the IBC Code and MARPOL Annex II, having a great impact on many tankers, need to be addressed well in advance of their entry into force on 1 January 2021.

A comprehensive set of amendments to the International Code for the construction and equipment of ships carrying dangerous chemicals in bulk (IBC Code) will enter into force on 1 January 2021 (Res. MEPC.318(74)) and will greatly impact on all chemical tankers (i.e. new and existing) regardless of their tonnage.

The main modifications are relevant to:

### **1. Special requirements of Hydrogen Sulphide (H<sub>2</sub>S) detection equipment**

Ships carrying bulk liquids prone to H<sub>2</sub>S formation shall be provided with H<sub>2</sub>S detection equipment (Ch. 15), except for those vessels already having toxic vapour detection instruments complying with the requirements in para. 13.2.1 of the Code able to test for H<sub>2</sub>S;

### **2. Revision of carriage requirements of chemical products**

Due to the revision of the criteria for assigning carriage requirements to chemicals (Ch. 21), the provisions for each specific cargo (Ch.s 17 and 18) have been reassessed and amended accordingly, including the toxicity categorization. Consequently, a high number of products currently categorized as non-toxic, will turn to be toxic cargoes, such as - for example - the methyl alcohol.

Such revision differently impacts on existing chemical tankers depending on the ship and the products normally carried: there may be cases where only operational changes are sufficient to comply with the new carriage requirements; while, for some products, important modifications to the ship's equipment or tank type may be necessary to continue carrying such chemicals after 1 January 2021.

In any case, it is expected that many existing tankers shall need to have on board a new Certificate of Fitness including a new List of Products based on the revised requirements. The revised Certificate can be issued before 1 January 2021 with the same expiry date as the existing one and a stamp/text on the front page stating that the revised certificate is effective, and supersedes the existing certificate, on 1 January 2021.

It should be also noted that if a cargo is loaded prior to 1 January 2021 and unloaded after, the relevant provisions of the IBC Code at the time of loading are applicable until the cargo has been unloaded.

On 1 January 2021, new demanding operational requirements in MARPOL Annex II (Res. MEPC.315(74)) will also enter into force, imposing to tankers operating in specific areas (i.e. North Western European waters, Baltic Sea area, Western European waters, Norwegian Sea) a prewash procedure for certain persistent

floaters products (i.e. substances of pollution category “Y” that are persistent floaters with a viscosity equal to or greater than 50 mPa·s at 20°C and/or with a melting point equal to or greater than 0°C, as identified by ‘16.2.7’ in column ‘o’ of IBC Code Ch 17). The residue/water mixture generated during the prewash shall be discharged to a reception facility at the port of unloading until the tank is empty. The instructions on how to deal with tank washing for these substances shall be included in the Procedures and Arrangements Manual which shall be re-approved by 1 January 2021. These new requirements will be applicable, for example, to the following products: Fish oil, Olive oil, Palm oil, Paraffin wax highly-refined, Rice bran oil and sunflower seed oil.

In view of the above, RINA is ready to assist shipowners for a timely and effective implementation of the upcoming requirements, including the issue of new Certificates of Fitness and the approval of updated Procedures and Arrangements Manuals.

[Download Res\\_MEPC.315\(74\).pdf](#)

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Best Regards.

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